

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

LEONARDO ALMONTE-RAMIREZ

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1:14-cr-00021-JL

DEFENDANT'S PROPOSED LIMITING INSTRUCTION

You have heard evidence that the defendant handed cocaine to Lindsey Proulx on May 9, 2013. This evidence is being offered and may be considered for the purpose of showing the defendant's state of mind at the time. This is not the alleged cocaine that the defendant is charged with possessing, and you should not convict him of any of the charged offenses for possessing it. You should treat this evidence in all other respects like any other evidence to determine the defendant's knowledge or intent to commit the charged offenses. You are free to believe it fully, in part, or not at all and you may consider it in deciding whether the defendant possessed with the intent to distribute the various drugs allegedly found in the Jeep Cherokee, which are the offenses charged in the Indictment.

Respectfully submitted,

Dated: July 7, 2014

/s/ Charles A. Bookman
Bookman & Al-Marayati
802 Main Street
Melrose, MA 02176
(781) 712-0007

NH BAR# 11399
chuck@bookmanlaw.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the within Motion was this day served upon all counsel of record by electronic notification.

Dated: July 7, 2014

/s/ Charles A. Bookman
Bookman & Al-Marayati